EXHIBIT 8

JAMES v. HAMPTON, ET AL.

PAMELA ANDERSON

October 12, 2017

Prepared for you by

BIENENSTOCK
NATIONWIDE COURT REPORTING & VIDEO
A U.S. Legal Support Company

US LEGAL SUPPORT
The Power of Commitment™

Bingham Farms/Southfield • Grand Rapids
Ann Arbor • Detroit • Flint • Jackson • Lansing • Mt. Clemens • Saginaw • Troy

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

SYLVIA JAMES,
Plaintiff,
vs. Case No. 2:12-cv-10273
Hon. Paul D. Borman
Magistrate Judge R. Steven Whalen
HILLIARD HAMPTON, et al.,
Defendants.
____

The Deposition of PAMELA ANDERSON,
Taken at 17430 North Laurel Park Drive, Suite 120E,
Livonia, Michigan,
Commencing at 2:39 p.m.,
Thursday, October 12, 2017,
Before Helen F. Benhart, CSR-2614.

APPEARANCES:

JASON R. HIRSCH
Morganroth & Morganroth, P.L.L.C.
344 North Old Woodward Avenue
Suite 200
Birmingham, Michigan 48009
248.864.4000
jhirsch@morganrothlaw.com
Appearing on behalf of the Plaintiff.

DOUGLAS G. POWE
Assistant Attorney General
Civil Litigation, Employment, and Elections Division
5th Floor G. Mennen Williams Building
525 West Ottawa Street
Lansing, Michigan 48933
517.373.6434
powed1@michigan.gov
Appearing on behalf of Defendants JTC, Washington, and Green.

ADAM T. RATLIFF
Warner, Norcross & Judd, L.L.P.
2000 Town Center
Suite 2700
Southfield, Michigan 48075
248.784.5154
aratliff@wnj.com
Appearing on behalf of Defendant Fischer.

MICHAEL A. COX
The Mike Cox Law Firm, P.L.L.C.
17430 Laurel Park Drive North
Suite 120E
Livonia, Michigan 48152
734.591.4002
mc@mikecoxlaw.com
Appearing on behalf of Defendant Anderson.

TABLE OF CONTENTS

WITNESS	PAGE
PAMELA ANDERSON	
EXAMINATION	
BY MR. HIRSCH:	5
EXAMINATION	
BY MR. COX:	65

EXHIBITS

EXHIBIT	PAGE
(Exhibits attached to transcript.)	
DEPOSITION EXHIBIT 1	52
DEPOSITION EXHIBIT 2	58

Page 5

Livonia, Michigan
Thursday, October 12, 2017
2:39 p.m.

PAMELA ANDERSON,
was thereupon called as a witness herein, and after having first been duly sworn to testify to the truth, the whole truth and nothing but the truth, was examined and testified as follows:

MR. HIRSCH: Good afternoon, ma'am. My name is Jason Hirsch. I'm one of the attorneys for plaintiff in this matter.

Let the record show that this is the deposition of Pamela Anderson taken pursuant to Notice under the Federal Rules of Civil Procedure.

EXAMINATION

BY MR. HIRSCH:

Q. Miss Anderson, I'll be asking you a series of questions. You understand you were just sworn in. Your answers will be given under oath.
A. Yes, sir.
Q. And please make sure to answer verbally so that the court reporter can record your answers, okay?
A. Yes.
Q. And if at any time you do not understand a question,

Page 6

please say so and I will try to clarify, okay?
A. Okay.
Q. Please let me finish my entire question before you give your answer both to make sure you understand the question I'm asking and because our court reporter can't record two of us talking over each other, okay?
A. Okay.
Q. I certainly don't think this will be a marathon, but at any time you need a break, restroom, whatever, please let me know and we'll take a break, okay?
A. I will.
Q. If at any time I interrupt you, and I'll certainly try not to do that, but if I do, let me know and we'll let you complete your answer for the record, okay?
A. Okay.
Q. Can I have your full name for the record, please?
A. Pamela Ann Anderson.
Q. Your date of birth, ma'am?
A. 12/28/1960.
Q. Where did you attend undergraduate college?
A. Henry Ford Community College and then U of M Dearborn.
Q. What were the time periods at Henry Ford?
A. '79 to '81.
Q. And did you receive a degree from Henry Ford?
A. Yes, I did.

Page 7

Q. What degree did you receive?
A. An associate's degree.
Q. In what field?
A. General studies.
Q. And you said you then attended U of M Dearborn, correct?
A. Correct.
Q. What was the time period for that?
A. That would have been two years after that so --
Q. Around 1983?
A. Yes.
Q. And did you obtain a degree from U of M Dearborn?
A. Yes, I did. That would have been in '84.
Q. What was that degree?
A. A bachelor's degree in general studies.
Q. Is that a bachelor of arts in general studies?
A. Yes, a bachelor of arts.
Q. And you attended law school, correct?
A. Yes, I did.
Q. Where did you attend law school?
A. Detroit College of Law.
Q. And what time period did you attend Detroit College of Law?
A. 1984 to 1987.
Q. And you received a J.D. from Detroit College of Law,

Page 8

is that correct?
A. Yes.
Q. You are a member of the State Bar of Michigan, correct?
A. Yes, sir.
Q. When did you first become a member of the State Bar or Michigan?
A. 1987.
Q. Are you a member of the bars of any other states?
A. No.
Q. Any federal courts?
A. Federal court, yes.
Q. Which ones?
A. In Detroit. I mean the State of Michigan, the usual -- when you get your law license you can register, if I'm correct, with federal court in Michigan.
Q. So that would be the Eastern District of --
A. Yes.
Q. Eastern District of Michigan, correct?
A. Yep. I'm sorry.
Q. Have you ever been the subject of any professional discipline?
A. No.
Q. Are you a member of any professional associations?

Page 9

A. **No.**
Q. Okay. Could you give me your employment history from the time you graduated law school forward?
A. **Well, I can give you general. I can't give you specific dates.**
Q. Okay.
A. **I started out at the law offices of Chris Polaczyk, and I can't even tell you how many years this has been so long ago. And then I worked for Canner and Bloom in Southfield. Then I worked for Schlussel and Drazin. I think their office was in Southfield. And then I moved back to the Inkster area. I worked out of David Perry's office for a short time and then I moved in with Adam Dadaou and ended up back with Chris Polaczyk. And I'm sorry. Before Adam Dadaou I had my own office across the street from Adam's office.**
Q. I think you've already told me you can't remember the time periods for these, correct?
A. **That is correct.**
Q. I'm going to go through these. With respect to the law offices of Chris Polaczyk, what type of law did you practice there?
A. **General practice.**
Q. With respect to Canter and Bloom, what sort of law did you practice there?

Page 10

A. **It's Canner and Bloom, C-A-N-N-E-R. They were personal injury.**
Q. Schlussel and Drazin, I get that one right?
A. **Correct.**
Q. What sort of law did you practice there?
A. **Personal injury.**
Q. Then you mentioned that you worked for David Perry, is that correct?
A. **That's correct.**
Q. Solo practitioner?
A. **He was, yes.**
Q. What sort of law did you practice with Mr. Perry?
A. **General practice.**
Q. And then I think you indicated you had your own office for a while.
A. **That's correct.**
Q. What sort of law did you practice when you had your own office?
A. **General practice.**
Q. And then you mentioned Adam Dadaou?
A. **Dadaou, D-A-D-A-O-U.**
Q. Were you working for Mr. Dadaou or a partnership? What was the situation?
A. **It wasn't a -- I'm sorry. It wasn't a partnership. I worked out of his office.**

Page 11

Q. But you were still -- you had your own practice, is that correct?
A. **That's correct.**
Q. So that would continue the general practice you told me about a moment ago, correct?
A. **That's correct.**
Q. Then I think you said you moved back to Chris Polaczyk, is that correct?
A. **That's correct.**
Q. And the practice was the same at the time you moved back, general practice?
A. **General practice, yes.**
Q. Okay. And do you recall what year that takes us up through?
A. **Well, that would take us up to the point in time when I was hired with the 22nd District Court, which was 2007.**
Q. Who hired you at the 22nd District Court?
A. **Who hired me?**
Q. Yes.
A. **Judge James.**
Q. And Judge James was the only judge at the 22nd District Court at that time, correct?
A. **That's correct.**
Q. And was Judge James your supervisor at that time?

Page 12

A. **Yes.**
Q. Is it fair to say that she was your supervisor the entire time she was at the court until she was put on administrative leave in 2011?
A. **That's a fair statement.**
Q. Did you get along with Judge James?
A. **Yes.**
Q. In fact, you liked Judge James, is that correct?
A. **That's correct.**
Q. Did you ever make any complaint to the State Court Administrator's Office about Judge James?
A. **No.**
Q. Did you ever make any complaint to any other organization about Judge James?
A. **No.**
Q. Did you ever make any anonymous complaints about Judge James to the Michigan Judicial Tenure Commission?
A. **No.**
Q. And did you ever make any anonymous complaints to any other agency about Judge James?
A. **No.**
Q. During the time Judge James was your supervisor, were you ever disciplined by Judge James?
A. **What do you mean by disciplined?**
Q. Well, she was your boss, right, fair to say?

Page 13

A. **Yes.**
Q. Okay. Did she ever tell you that anything you had done in your job was incorrect?
A. **There was a point -- one time the magistrate at the time, Jeffrey Bowdich, was responsible for the case age report, for doing the case age report, and Jeffrey Bowdich gave me the case age report, and I submitted that to the State of Michigan without having Judge James review it first, and Judge James was upset, so she told Magistrate Bowdich and I to write our own letters of reprimand.**
Q. Did you do that for your letter of reprimand?
A. **I did one, but it was never signed by Judge James. She never signed it.**
Q. Were you ever disciplined for behaving inappropriately at the office?
A. **No.**
Q. Did you ever engage in any intimate behavior while you worked at the 22nd District Court at the office?
A. **No.**
Q. Now, you mentioned a moment ago Jeffrey Bowdich, correct?
A. **Correct.**
Q. He was a magistrate at the 22nd District Court at least for a portion of the time you were there,

Page 14

correct?
A. **Correct.**
Q. Did Mr. Bowdich ever accuse you of behaving inappropriately at the office?
A. **No.**
Q. You had an office at the 22nd District Court, correct?
A. **Yes.**
Q. Was there a sliding glass window at your office at the 22nd District Court?
A. **Yes.**
Q. That was a clear glass window, is that right?
A. **Yes.**
Q. Did you ever put up any type of covering to cover that window?
A. **A covering? No.**
Q. So the window was always clear and you could see in?
A. **Yes.**
Q. Who is Kevin Dokes?
A. **He was a court officer.**
Q. At the 22nd District Court?
A. **Yes.**
Q. At the time you were there as well, correct?
A. **Yes.**
Q. Did you ever prepare a letter to Mr. Dokes regarding his employment under Judge James' signature?

Page 15

A. **No.**
Q. Were you ever disciplined for allegedly preparing a letter under Judge James' signature which she had not approved?
A. **No.**
Q. You mentioned before a situation about submitting a case age report that had been prepared by Mr. Bowdich, correct?
A. **That's correct.**
Q. Did you ever prepare any attendance data for Judge James?
A. **Attendance data?**
Q. Yes.
A. **Can you clarify?**
Q. Did you ever prepare any data or summary about days Judge James had been in court?
A. **Yes.**
Q. Was that also submitted to the State Court Administrator's Office?
A. **No. Let me clarify. That was submitted to Maggie Rynier from the JTC.**
Q. That was later, correct?
A. **Correct.**
Q. Were you ever disciplined for preparing attendance data that was inaccurate?

Page 16

A. **No.**
Q. Were you ever directed to come in on a Saturday to correct a report that Judge James thought was inaccurate that had been submitted to the State Court Administrator's Office?
A. **I don't recall that.**
Q. You don't recall any Saturday where you came in along with Mr. Bowdich to correct a report that had been submitted?
A. **I don't recall that.**
Q. Mr. Bowdich was not your supervisor, is that correct?
A. **That's correct.**
Q. So he would not have had the authority to discipline you, is that correct?
A. **That's correct.**
Q. Okay. Did you ever make any complaint about Mr. Bowdich to Judge James?
A. **Complaints? No. If I may expound on that.**
Q. Go ahead.
A. **I did tell her that he did sit in his office with his feet up. If that's a complaint, then yes.**
Q. Did you convey that to Judge James orally?
A. **Yes.**
Q. What was her response when you told her that?
A. **I don't recall.**

Page 17

Q. Do you know if she took any action with respect to you indicating that Mr. Bowdich was sitting with his feet up?
A. **No.**
Q. Do you recall if he continued to do that after you had made that complaint?
A. **I don't recall.**
Q. You're aware that there came a time when Judge James was being investigated by the Michigan Judicial Tenure Commission, correct?
A. **Correct.**
Q. Do you recall when you first learned that Judge James was being investigated by the Michigan Judicial Tenure Commission?
A. **No, I can't recall. It was five or six years ago.**
Q. Do you recall how you first learned about that?
A. **Judge James told the whole court, all court employees.**
Q. So the first time you learned about the investigation into Judge James by the JTC was from Judge James at a meeting with the court staff?
A. **Yes.**
Q. Was that the same day that Judge James was placed on administrative leave?
A. **I don't recall.**
Q. Do you recall what time of day that meeting took

Page 18

place?
A. **Toward the end of the day.**
Q. What was your reaction when you heard that?
A. **I mean, I was surprised.**
Q. After you had learned that the investigation was going on, what was the next thing you heard about the investigation?
A. **Judge -- I believe it was Judge James again telling us that she was going to be removed.**
Q. Was that at the same meeting you just described or was that later?
A. **As I stated, this happened five or six years ago. I don't remember the specifics of, you know, what was said first or when she was removed, but I thought there was a period of time from when we first found out she was being investigated to when she was removed.**
Q. Okay. And you first found out when Judge James told you so that there was a period when Judge James was still at the court acting as chief judge before she was placed on administrative leave?
A. **That's correct.**
Q. Do you recall how long that time period was?
A. **No.**
Q. What was the first communication you had with any

Page 19

representative of the Michigan Judicial Tenure Commission about Judge James?
A. **Can you restate that, please.**
Q. Well. Let me ask a slightly different question.
A. **Okay.**
Q. Did you have any communication with the Michigan Judicial Tenure Commission about its investigation of Judge James?
A. **Yes.**
Q. When was the first communication you had with any representative of the Judicial Tenure Commission about Judge James?
A. **I don't have a specific date, but it was after Judge James was removed.**
Q. So it was after she was on administrative leave at least?
A. **Correct.**
Q. Who did you speak to during the first communication?
A. **Deborah Green.**
Q. And was it your impression that Ms. Green was acting on behalf of the Judicial Tenure Commission?
A. **Yes.**
Q. Did you know Judge -- strike that. I'm sorry.
Did you know Ms. Green prior to this conversation?

Page 20

A. **I knew who she was. I cannot tell you specifically if I met her before this meeting, but I knew who she was because I would go to the State Court Administrator meetings once a month.**
Q. So did you understand that Ms. Green worked for the State Court Administrator's Office?
A. **Yes.**
Q. So focusing again on this first call that you had with -- strike that.
This was a telephone call with Ms. Green?
A. **No, it was not.**
Q. Okay. Did Ms. Green come to the courthouse?
A. **Yes.**
Q. And you met with her in person?
A. **Yes.**
Q. Was anybody else in that meeting the first time you spoke with Ms. Green?
A. **No.**
Q. Do you know if anyone had come with Ms. Green to the courthouse?
A. **I have no idea.**
Q. Where did the meeting with Ms. Green take place?
A. **In the court administrator's office, my office.**
Q. That would be your office?
A. **Correct.**

Page 21

Q. And what did Ms. Green say to you during this first meeting?
A. Everything? I mean, I can't recall everything she said to me.
Q. Can you tell me the substance of what she said to you?
A. She told me that Judge James was under investigation, and I believe at that time she asked if there were any documents. She told me -- she said, you know, I could possibly get you immunity if you agree to testify. I said immunity from what? I didn't do anything wrong.
Q. Did Ms. Green tell you the nature of what the JTC was investigating Judge James about?
A. I'm sure she did, but I don't recall specific words that she used.
Q. You indicated she asked you if there were any documents that you had. Is that what she asked you?
A. That's correct.
Q. And do you recall what sorts of documents she was asking for?
A. Well, I know that there was an issue regarding travel expenses and things like that.
Q. Now, you also said that Ms. Green said she could get you immunity if you testified, is that correct?
A. Correct.
Q. What did you understand that to mean?

Page 22

A. That's why I -- I mean, I didn't understand what she was saying. That's why I said immunity from what. I didn't do anything wrong.
Q. Did Ms. Green answer when you said immunity from what?
A. No.
Q. When Ms. Green asked you if you could get her any documents, what did you say to her?
A. Sure. She was working for the State Court Administrator's Office. I had to honor her request.
Q. And did you in fact get her documents at that time?
A. No.
Q. Did you subsequently get her documents?
A. Not her specifically.
Q. Do you recall how long your meeting was with Ms. Green?
A. No.
Q. Do you recall if the door to your office was open or closed during the meeting?
A. No.
Q. Do you know if Ms. Green met with anyone else while she was at the court?
A. No, I do not.
Q. Do you recall what time of day the meeting took place?
A. No.
Q. Do you know if you were the first meeting Ms. Green

Page 23

had when she arrived at the court?
A. I do not know that.
Q. Do you know where Ms. Green went when she finished the meeting and left your office?
A. No.
Q. What did you do after you finished the meeting?
A. I don't recall.
Q. It would be fair to say that you were attempting to cooperate with the request Ms. Green had made?
A. That's correct.
Q. What was the next thing that happened in terms of your involvement in the investigation of Judge James after your meeting with Ms. Green?
A. I don't recall. I don't know how to answer what was my next thing.
Q. Do you recall looking for documents to provide?
A. Yes.
Q. And one thing you mentioned were maybe there were some documents about travel expenses, is that correct?
A. Correct.
Q. Do you recall any other category of documents that you might have been looking for?
A. Community service checks.
Q. With respect to the travel expense documents, was it part of your job duties to be the custodian of those

Page 24

documents?
A. I did not have them all, no.
Q. Well, just to be clear, no, it wasn't part of your duties or, no, you just didn't have them all?
A. It was not part of my duties.
Q. Okay. With respect to community service checks, was that part of your duties, to be the custodian of those checks?
A. Yes.
Q. In terms of the categories of documents, two of which you could recall right now, right?
A. Yes.
Q. Were those categories both categories that were requested of you by Ms. Green or did you come up with the categories to deliver?
A. I did not come up with the categories.
Q. Now, you said with respect to travel expenses you were able to locate some but not all documents, is that right?
A. That's correct.
Q. What about on the community service checks? Were you able to locate all the community service checks?
A. I can't say all, but I know I had the majority.
Q. Okay. When you had compiled those categories of documents, what did you do with them?

Page 25

A. I don't recall.
Q. Do you recall whether you ever contacted Ms. Green to say I got the categories of documents you mentioned?
A. I don't recall ever dealing with Deborah Green again.
Q. Okay. Do you know who Paul Fischer is?
A. Yes.
Q. Did you ever speak to Mr. Fischer in connection with the investigation of Judge James?
A. No.
Q. Do you know who Margaret Rynier is?
A. Yes.
Q. Did you ever speak to Ms. Rynier in connection with the investigation of Judge James?
A. Yes.
Q. How many times?
A. Numerous. I don't recall a specific number.
Q. Do you recall the first time you spoke with Ms. Rynier about the investigation of Judge James?
A. No, I don't recall the first time.
Q. Do you recall if it was before or after your in-person meeting with Ms. Green?
A. After.
Q. Was your contact with Ms. Rynier by phone or in person?
A. I don't recall if the first contact was by phone or in

Page 26

person. I do not recall that.
Q. Did you call Ms. Rynier or did she call you?
A. I don't think I initiated the phone call.
Q. Do you recall --
A. If it was a phone call.
Q. Well, let me ask this. Have you both -- well, strike that.
Had you met Ms. Rynier in person before the JTC hearing?
A. Yes.
MR. COX: Just so we're clear, we're talking about the actual hearing as opposed to the investigation?
MR. HIRSCH: I'm sorry. You're right.
BY MR. HIRSCH:
Q. The underlying hearing before the master.
A. That's correct.
Q. Because we know she questioned you I think at that hearing, correct?
A. Yes, she did.
Q. Do you recall the substance of your first conversation with Ms. Rynier?
A. No, I do not.
Q. Do you recall the substance of any conversations you had with Ms. Rynier about the investigation with Judge

Page 27

James prior to the JTC hearing before the master?
A. Oh, yes. We went over the community service check requests and things like that. We went over Judge James' time off. We went over how Judge James requested reimbursement for travel, things of that nature.
Q. What did you go over with respect to the community service fund?
A. We went over check by check basically what that check was written for, who requested it.
Q. So Ms. Rynier was asking you for that information, and you were able to discern it from your records, is that correct?
A. That's correct.
Q. With respect to time off I think was the second category you mentioned, correct?
A. Correct.
Q. What did you go over in terms of time off with Ms. Rynier?
A. There was a calendar that I had, and there were days where Judge James was either at a conference or where she didn't come in to work.
Q. So you shared the calendar with Ms. Rynier?
A. Yes.
Q. Was that a paper calendar or an electronic calendar?

Page 28

A. Paper.
Q. And, by the way, with respect to the CSP checks, you had like a check register, is that correct?
A. There was a check register, but I recall going over the actual checks.
Q. So these would be photocopies of canceled checks, would that be correct?
A. If my memory is correct, there would be a photocopy of a check and/or a check request.
Q. And those were on paper, right?
A. Yes.
Q. I think the last category you recalled from your conversation with Ms. Rynier was reimbursement for travel expenses, is that correct?
A. Correct.
Q. What did you discuss with Ms. Rynier about reimbursements for travel expenses?
A. She wanted to know how Judge James was reimbursed for travel expenses, and I showed her the form that we had that Judge James would fill out saying how much the hotel would cost, how much the air fare would cost, a per diem for her expenses, and that request would be sent over to the City of Inkster, and they would issue Judge James a check.
Q. With respect to the reimbursement for travel, had you

Page 29

suggested there was anything improper about any reimbursements?
A. No.
Q. With respect to the calendar with days off, did you suggest there was any problem with the days off that were taken by Judge James?
A. I just indicated that she was off a lot.
Q. And with respect to the checks you reviewed with Ms. Rynier for the community service program, did you suggest there was anything improper about any of those checks?
A. No.
Q. Did you ever speak to Cas Swastek?
A. No.
Q. Just to be sure your recollection is correct, he is another examiner with the Judicial Tenure Commission. Does that ring any bells?
A. No. No.
Q. Okay. Did you ever speak to any of Judge James' attorneys? And, again, prior to the JTC hearing where I know they questioned you.
A. No.
Q. Do you recall whether any of Judge James' attorneys attempted to contact you?
A. From my recollection, they did not.

Page 30

Q. And you did not attempt to contact them, correct?
A. No. That's correct.
Q. Did you have any communication with Judge James from the time she was placed on administrative leave until, let's say, the JTC hearing?
A. No, I did not.
Q. Do you recall there was an interim judge who came in to replace Judge James when she was placed on administrative leave?
A. Yes.
Q. When did you first hear that an interim judge was going to come in?
A. I don't recall. Of course after Judge James was removed, but I don't know when I was told.
Q. Do you recall who told you?
A. No.
Q. Who was the interim judge who replaced Judge James when she was placed on leave?
A. Valdemar Washington.
Q. Do you know how Judge Washington was selected to serve as interim judge?
A. No, I do not.
Q. Do you know who selected Judge Washington to serve as interim judge?
A. No, I do not.

Page 31

Q. Did anybody ever ask you for any input as to who should serve as interim judge?
A. No.
Q. Did you know Judge Washington before the time he served as interim judge?
A. No.
Q. So fair to say the first time you met Judge Washington was when he came in to serve as interim judge, is that correct?
A. That's correct.
Q. Did Judge Washington meet with you when he came in to serve as interim judge?
A. Yes.
Q. Was that a solo meeting, just you and Judge Washington?
A. Yes.
Q. Where did that meeting take place?
A. I believe it was in the jury room.
Q. What did you discuss with Judge Washington at this meeting?
A. I don't recall.
Q. Did Judge Washington indicate that he would make a decision as to whether you would remain as court administrator?
A. No.

Page 32

Q. Did Judge Washington ask you for any documents at that meeting?
A. No.
Q. There came a point when Mr. Bowdich was removed from his position as magistrate, is that correct?
A. That's correct.
Q. Was that before or after Judge Washington was appointed?
A. After.
Q. Do you recall when Mr. Bowdich was removed as magistrate?
A. No.
Q. Did you have any involvement in that decision?
A. No.
Q. You were appointed as magistrate after Mr. Bowdich was removed, is that correct?
A. That's correct.
Q. Did you apply for that position?
A. Yes, I did.
Q. Do you know if anyone else applied for that position?
A. Yes.
Q. Do you know how many other people applied for that position?
A. No, I do not.
Q. Do you know who made the decision to appoint you as

Page 33

magistrate?
A. Judge Washington.
Q. Did someone come in then to replace you as court administrator or did you continue to do both sets of duties?
A. I continued both.
Q. Did Judge Washington invite you to apply for the position of magistrate?
A. I don't know what you mean by invite.
Q. Well, how did you learn that applications for the position of magistrate would be accepted?
A. Through Judge Washington.
Q. That would be orally or --
A. Yes, orally.
Q. Had you previously applied for the position of magistrate of the 22nd District Court?
A. No.
Q. Where were you living at the time you were appointed magistrate?
A. In Inkster.
Q. Did you also have another residence at that time?
A. Yes.
Q. Where was your other residence?
A. In Wayne.
Q. Was the place you were living in Inkster your mother's

Page 34

home?
A. Yes.
Q. Were you an elector in the City of Inkster at that time?
A. Yes.
Q. Did Judge Washington use Judge James' former office as his office?
A. Yes.
Q. Was there any clean-up done of Judge James' office before Judge Washington moved in?
A. No.
Q. Was there any clean-up done of Judge James' office after Judge Washington moved in?
A. Yes.
Q. Were you involved in that clean-up?
A. No.
Q. Who was?
A. Judge Washington and Nicole James.
Q. Do you know whether Judge Washington ever -- well, strike that.
Did Judge Washington ever ask you to search for any documents regarding Judge James?
A. To be on the lookout for them, so to speak, not to search.
Q. What sort of documents did Judge Washington ask you to

Page 35

be on the lookout for?
A. Documents relating to community service and travel of Judge James, travel expenses.
Q. And you did that I presume? You stayed on the lookout, is that right?
A. Yes.
Q. Did you ever find any of those categories of documents?
A. Yes.
Q. And what did you do with them when you found them?
A. I believe I showed them to Judge Washington, and I know ultimately Maggie Rynier received the documents.
Q. When you say ultimately Ms. Rynier received the documents, did you give them to Ms. Rynier?
A. I don't recall the chain of command, if they went from me directly to her or from me to Judge Washington to Ms. Rynier.
Q. Did you keep any copy of what you gave to either Judge Washington or Ms. Rynier?
A. I don't recall. Me personally? I don't have any documents, if that's where you're going.
Q. Well, today you don't have any documents?
A. No, I do not have any documents.
Q. But you don't recall whether you may have made a copy at the time, right?

Page 36

A. Right. I don't recall.
Q. If you did, you would have left those at the court. You certainly wouldn't have taken those with you after you left?
A. That's correct.
Q. We haven't quite gotten there, but you are no longer employed by the 22nd District Court?
A. That's correct.
Q. Do you know whether Judge Washington ever conducted a search of Judge James' office?
A. I don't know.
Q. Did Judge Washington ever ask you to conduct a search of Judge James' office?
A. No, he did not.
Q. Do you know whether Judge Washington ever asked any other staff member of the 22nd District Court to make a search of Judge James' office?
A. I do not know.
Q. You were familiar with Judge James' office at the courthouse, correct?
A. Yes.
Q. Was there a lock on Judge James' office door?
A. Yes.
Q. Do you know who had the keys to that lock, the office door lock?

Page 37

A. At what point in time?
Q. While Judge James was the chief judge of the court, do you know who had the keys to the door to her office?
A. Yes.
Q. Who had the keys?
A. Judge James and Nicole James.
Q. You did not have a key?
A. I did not.
Q. How do you know Nicole James had a key?
A. It was just known. Nicole James was the court reporter, so she had to go in Judge James' office periodically to get -- retrieve items, so the only two people who ever had a key to Judge James' office while I was there was the court reporter and Judge James.
Q. When Judge James was --
A. I'm sorry. Not court reporter, judicial secretary.
Q. When Judge James was placed on administrative leave, do you know whether she gave her office key to anyone?
A. No, I do not know that.
Q. When Judge James was placed on administrative leave, she left for the last time before being placed on leave, do you know whether her office door was locked or unlocked?
A. I do not know that.
Q. I take it you don't know whether the door was

Page 38

physically open or closed, correct?
A. That's correct. I do not know. I left before Judge James left.
Q. Now, you did tell me that when Judge Washington came he did use Judge James' office, right?
A. Correct.
Q. Do you recall if he had any difficulty entering Judge James' office when he got there?
A. I don't know that.
Q. He never asked you to open the door, correct?
A. Correct.
Q. Did you get a key to Judge James' office at that time, in other words, when Judge Washington came in and it was his office?
A. I don't recall if I did or not because Judge Washington never locked the door.
Q. There was a private bathroom in Judge James' office, is that correct?
A. Yes.
Q. Did you ever use that restroom?
A. No.
Q. Are you aware there was also a safe in Judge James' office?
A. Yes.
Q. How did you first become aware there was a safe in her

Page 39

office?
A. Because Judge James would leave the bathroom door open, and when I would go in there to speak to Judge James, you could see the safe. I believe it was under the sink.
Q. Do you know whether that safe was owned by Judge James or whether it was owned by the court?
A. I don't know.
Q. By the way, you said when you were hired Judge James was already there, right? She hired you?
A. Correct.
Q. Was the safe there when you first got there?
A. I don't know when it was placed there.
Q. Did you not have a key to the safe, correct?
A. No.
Q. Was it a lock with a key that had to be used to the safe or you don't know?
A. I don't know.
Q. To the extent there was a combination, you didn't have the combination, would that be correct?
A. If there was a combination, that's correct. I did not have that, either.
Q. So if the safe was locked, you couldn't get into it, correct?
A. That's correct.

Page 40

Q. Did you enter what had been Judge James' office after she was placed on leave --
A. Yes.
Q. -- when Judge Washington was there?
A. Yes.
Q. Would you enter only when Judge Washington was present or would you enter at other times?
A. I may have entered at other times to place a file on his desk, but I didn't go and sit in there.
MR. COX: Doing okay?
THE WITNESS: Mm-hum.
MR. HIRSCH: Yeah. I mean, if you want to --
THE WITNESS: I'm fine.
MR. HIRSCH: You let us know.
BY MR. HIRSCH:
Q. When you were in the office during Judge Washington's tenure, did you notice whether the safe was open or closed?
A. No, I did not.
Q. So you don't know one way or the other during that time, correct?
A. No.
MR. COX: I'm sorry. You said during Judge James' tenure or Judge Washington's?

Page 41

MR. HIRSCH: Let me reask the question.
Actually, can you read the question back, make sure we get it right.
(The requested portion of the record was read by the reporter at 3:31 p.m.)
THE WITNESS: Correct.
BY MR. HIRSCH:
Q. Did there ever come a time when you saw that the safe had been opened?
A. That the safe was open?
Q. Yes, opened.
A. Yes.
Q. When was that?
A. I don't recall the exact day, specific date.
Q. Do you recall why it was you were in the office when you noticed the safe was open?
A. It was brought to my attention. Judge Washington called me back to his office.
Q. And when Judge Washington called you back to his office, what did he say?
A. He said look, there's documents in the safe.
Q. Were you standing in the office area or were you in the restroom area where the safe was?
A. At that time in the office area.
Q. And so the door to the safe was physically open then?

Page 42

A. It was ajar, yes.
Q. Well, you said Judge Washington said, look, there's documents in the safe, is that correct?
A. Correct.
Q. Could you see -- was the door open far enough to see there were documents in the safe?
A. I don't recall that, to be honest.
Q. And what did you say to Judge Washington when he pointed that out to you?
A. I walked over to the safe. I looked in. I saw there were documents. The safe was ajar just enough where you could fit your hand in. I reached in. I pulled out a document. I said, oh, these are tax returns, and I put the document back in the safe.
Q. Was Judge Washington with you when you pulled out the document?
A. Yes.
Q. And what did he say to you after you looked at the document and put it back?
A. I don't recall.
Q. Did you do anything else with respect to those documents at that time?
A. No.
Q. Anything else said during your discussion with Judge Washington at that time?

Page 43

A. No.
Q. You just left and went back to your office, is that correct?
A. From what I recall, yes.
Q. Judge Washington was close enough that he would have heard you say these are tax returns, correct?
A. Yes.
Q. Could you tell how much paper was in the safe?
A. No. I would be guessing.
Q. During the time Judge James was the chief judge, did she ever tell you that no one was to go in her safe?
A. No.
Q. After Judge James was placed on administrative leave, did anyone ever tell you that no one was supposed to access Judge James' safe?
A. No.
Q. And you never saw anyone actually open the safe, correct?
A. I did not.
Q. A few minutes ago we talked about whether there'd been any clean-up of Judge James' then former office when she was placed on administrative leave, correct?
A. Yes.
Q. And you told me that Judge Washington and Nicole James had done some clean-up, is that correct?

Page 44

A. Correct.
Q. Did you witness the clean-up?
A. No, not really. I mean, when Judge Washington was sitting in there, he was going through paperwork. I don't know if that's clean-up or not.
Q. So you did not see what was being moved or removed, if anything was, right?
A. That is correct.
Q. So you couldn't tell me what they may have discarded or anything else, correct?
A. That's correct.
Q. But you know they were cleaning because you could observe them walking in and out of the office? I mean, how is it that you knew they were cleaning up?
A. Well, Judge James was a pack rat, so you could tell daily the papers were getting less and less. Stacks were getting smaller and smaller.
Q. So you know what the office looked like when Judge James was there, correct?
A. Correct.
Q. As you described, there were stacks of paper, correct?
A. Papers, files, yes.
Q. She was a pack rat?
A. Yes.
Q. A lot of stuff?

Page 45

A. Yes.
Q. And you noticed that when Judge Washington took over, as time progressed, those stacks got much smaller, right?
A. Correct.
Q. The office was -- had less stuff in it, is that fair to say?
A. That's a fair statement.
Q. But you don't know where the stuff that had been in the office when Judge James was there went to, is that correct?
A. That's correct.
Q. Did you ever discuss with Nicole James what she was removing or cleaning up in the office?
A. No, I did not.
Q. Did you ever discuss that same thing with Judge Washington?
A. No.
Q. When you said that you reached your hand into the safe and you took something out, was it a single sheet of paper or did you take out a stack?
A. I took out the first -- it was stapled together. I don't know how many pages. It was like a tax return.
Q. And did you see whose tax return it was?
A. I didn't look that close.

Page 46

Q. Okay. Do you recall whether you spoke with Ms. Green after Judge James was placed on leave about a problem with bench warrants?
A. I don't recall that.
Q. As the JTC investigation of Judge James continued, did you learn that the JTC was alleging Judge James had committed misconduct?
A. Yes.
Q. Do you recall when you first learned that?
A. No.
Q. Were you ever concerned that your own bar license could be in jeopardy as a result of this investigation?
A. No.
Q. Were you ever concerned that you may have violated some rule of conduct?
A. No.
Q. You mentioned that during your first in-person conversation with Deborah Green, she said maybe she could get you immunity, correct?
A. Correct.
Q. And you were concerned by that statement, correct?
A. That's correct.
Q. Did anyone else ever discuss getting you immunity with respect to the investigation of Judge James?

Page 47

A. No, they did not. That was the first and last time it was ever brought up.
Q. And did anyone ever suggest that they could make sure you were able to keep your law license in connection with the investigation of Judge James?
A. No.
Q. You would agree with me that there were documents that were removed from Judge James' office, right?
A. What do you mean by the word documents?
Q. Well, some of those either stacks or files, right, were removed from her office because you said that the stacks were depleted after Judge James had left, correct?
A. But I'm making an assumption that they were removed. I don't know what happened to them.
Q. They weren't still there, right? They weren't in the office?
A. Correct. That's a correct assumption.
Q. You don't know were they went, but they weren't in the office anymore, right?
A. I don't know that. I mean, I don't know if Judge Washington put them somewhere else. I didn't go and look for documents or anything in Judge James' office so I don't know.
Q. So it's possible that the documents weren't removed

Page 48

but things were reorganized in such a way that it appeared there were less documents?
A. Could have been, correct.
Q. You did not provide any instructions to Nicole James in terms of what she was supposed to be doing in either tidying or clearing out Judge James' office, is that correct?
A. No, I did not.
Q. Do you know whether Judge Washington instructed Nicole James?
A. No, I do not.
Q. Did Judge Washington lock the office door at night when he was done for the day?
A. Usually not. He had an open-door policy.
Q. But he did have a key to the office, correct?
A. Correct.
Q. And did you have a key at this time?
A. I think I testified earlier I don't recall.
Q. You don't recall. Do you know where Judge Washington got his key to the office?
A. No, I do not.
Q. Do you recall that there was some material that was packed up by Nicole James that went into your office?
A. Yes.
Q. Do you recall there were four boxes of stuff that went

Page 49

into your office?
A. **That sounds accurate.**
Q. Did you ever review what was in those boxes?
A. **Briefly, yes.**
Q. What was in them?
A. **Old registers of actions, old pleas by mails. They were from like the 1990s. There were files, court files, old court files, newspapers, bags, miscellaneous garbage type things.**
Q. Did you understand that that was material that had been removed from Judge James' former office?
A. **I honestly I don't know where she got it from because Judge James had a table sitting outside her office that was packed with papers and so forth, old files. I don't know where Nicole got those boxes from.**
Q. Did Nicole James tell you why she was bringing those four boxes to your office?
A. **I don't remember.**
Q. You did not review everything in those boxes, correct?
A. **I can't say that I did, no.**
Q. What did you do with those four boxes?
A. **They were given to Brianna Purdy. Her name at the time was Brianna Burdon, and she was instructed to shred the old registers of actions and pleas by mail and to take care of the court files that were located**

Page 50

inside.
Q. And you gave Ms. Purdy that direction?
A. **Yes.**
Q. Do you know if Ms. Purdy did that?
A. **I believe she did, yes.**
Q. Did Ms. Purdy ever report back to you about whether she had found any other documents in those boxes?
A. **No, she did not.**
Q. And so far as you know, the documents you directed to be shredded, old registers of actions and court dockets were shredded, and the files would have been stored?
A. **Old registers of actions and pleas by mail, not court dockets, and the files, I don't know what Ms. Purdy did with the files.**
Q. She wasn't supposed to shred those, though?
A. **That's correct.**
Q. So Ms. Purdy would have had to go through to figure out what was what, right?
A. **Yes.**
Q. You hadn't sorted it into stacks or anything. She had to go through the boxes according to your directions of categories, right?
A. **That's correct.**
Q. You did not participate, though, in that sorting

Page 51

process, correct?
A. **Initially I may have -- like I indicated, I started going through to see what was in the boxes, but I did not go through everything.**
Q. So you can't really be sure what was shredded, correct?
A. **That's a fair statement.**
Q. You did not keep a log of what was shredded, correct?
A. **Correct.**
Q. Do you know whether anyone else made a log or index of what was shredded?
A. **I do not know that.**
Q. Do you recall whether you had seen the one document from the safe before or after you gave these directions to Ms. Purdy to sort through and shred some documents from these boxes?
MR. COX: I'm sorry. Did you stay the one document?
MR. HIRSCH: Yeah.
BY MR. HIRSCH:
Q. You said when you went into the safe you looked at a single document, might have been stapled together, but you thought it was one document, right?
A. **That's correct.**
Q. So to sort of get the timeline, do you recall if that

Page 52

occurred before or after you had given these directions to Ms. Purdy about these four boxes?
A. **I don't recall.**
Q. You provided an affidavit in this case, correct?
A. **Correct.**
MR. HIRSCH: Let's mark this as Exhibit 1, please.
MARKED FOR IDENTIFICATION:
DEPOSITION EXHIBIT 1
3:50 p.m.
BY MR. HIRSCH:
Q. In paragraph -- well, strike that. First, this is the affidavit you provided in this case, correct?
A. **Yes.**
Q. In Paragraph 15 of your affidavit you say I did not know or suspect that Plaintiff may have a fourth amendment right related to her office or safe, correct?
A. **Correct.**
Q. You certainly do agree that people have a right to privacy under the fourth amendment, correct?
A. **Correct.**
Q. You practiced some criminal law, is that correct?
A. **Correct.**
Q. It would be fair to say you're generally familiar with

Page 53

the provisions of the fourth amendment, correct?
A. **Generally, yes.**
MR. COX: I guess I'm going to object to your asking her questions of legal opinions. I recognize it's part of the claim in defense, but I'm just doing that for the record.
MR. HIRSCH: Understood.
BY MR. HIRSCH:
Q. In any of the cases you handled when you were an attorney, do you recall if you ever had to litigate the issue of whether a search was improper under the fourth amendment?
A. **No, I did not.**
Q. So based on whatever knowledge you had about the fourth amendment, you did not believe that that would apply to Judge James' office or safe, correct?
A. **No, I did not.**
MR. COX: I'm also going to object. It assumes a fact not in evidence. I don't know that she ever said she knew it was Judge James' safe.
BY MR. HIRSCH:
Q. Just to reask it then, with respect to the safe in Judge James' office. I don't think that would change your answer, but do you understand my question?
A. **No. Will you restate it, please.**

Page 54

Q. Yes. So given whatever knowledge you had of the fourth amendment at the time, you did not believe that applied -- well, strike that. I lost my question. I may go back to it. I'm sorry.
You did know there was a lock on the office door, correct?
A. **Yes.**
Q. And you did know that the safe was locked, correct?
A. **No.**
Q. You knew that at some point it was locked, correct?
A. **I don't think I've ever testified to that. I don't know if it was locked or unlocked. I don't know that.**
Q. So you could only observe that it was closed, is that what you're saying?
A. **Correct.**
Q. But you don't know whether Judge James actually locked it, correct?
A. **That's correct.**
Q. And I think you also testified that Judge James did not leave her office door open when she was there, correct?
A. **Correct.**
Q. Sort of a contrast to what you call Judge Washington's open door?
A. **That's correct.**

Page 55

Q. And although you didn't know whether the safe was locked or not, you've already testified you certainly didn't have a key to it.
A. **That's correct.**
Q. All right. You didn't know the combination if there was a combination lock, correct?
A. **That's correct.**
Q. Did there come a point when Judge Hammer also came to the 22nd District Court?
A. **Yes.**
Q. When was that?
A. **I don't remember the exact date.**
Q. What was Judge Hammer's role?
A. **Judge Washington was no longer there so --**
Q. So they didn't overlap, is that correct?
A. **No.**
Q. Did you ever request that Judge Washington remain instead of bringing in Judge Hammer?
A. **Yes.**
Q. When do you that?
A. **I don't recall the exact date.**
Q. To whom did you make that request?
A. **I believe it was to the State Court Administrator's Office because they wouldn't extend Judge Washington's time.**

Page 56

Q. Why did you make that request?
A. **All court employees felt the same way, because we really liked Judge Washington.**
Q. Do you know whether Judge Washington wanted to stay on?
A. **He said he wanted to, yes.**
Q. Did you know Judge Hammer before he came to the 22nd District Court?
A. **Yes.**
Q. How did you know Judge Hammer before that time?
A. **I've practiced before Judge Hammer.**
Q. Did you have any opinion about Judge Hammer?
A. **I liked Judge Hammer.**
Q. So you liked both. It was just that Judge Washington was there and things had been working out?
A. **That's correct.**
Q. Did you stay on as magistrate when Judge Hammer arrived?
A. **Yes.**
Q. Ultimately you were terminated from your position at 22nd District Court, correct?
A. **I was laid off.**
Q. Why were you laid off?
A. **I have no idea.**
Q. Do you know who laid you off?

Page 57

A. Judge Hammer.
Q. That was on March 16th, 2012, correct?
A. Yes.
Q. Do you recall how long Judge Hammer had been in place prior to the time you were laid off on March 16th, 2012?
A. I would be guessing.
Q. Did you have any issues with Judge Hammer when he came on?
A. No.
Q. Do you know who was appointed to replace you as magistrate after you were laid off?
A. No, I do not.
Q. Do you know -- well, strike that. Do you know whether a new magistrate was hired?
A. I have no idea. To this day I do not know.
Q. Do you know whether a new court administrator was hired?
A. Yes.
Q. Do you know who that was?
A. Pricilla Gibbs.
Q. Was she an existing employee of the 22nd District Court?
A. Yes.
Q. So she changed positions essentially?

Page 58

A. Yes.
Q. What was her position before she became court administrator?
A. Court reporter.
Q. You filed a lawsuit as a result of your being laid off, correct?
A. Yes.
Q. And you sued Judge James and other people as well, correct?
A. I don't recall if it was Judge James.
MR. HIRSCH: Can we mark this as Exhibit 2, please.
MARKED FOR IDENTIFICATION:
DEPOSITION EXHIBIT 2
3:58 p.m.
BY MR. HIRSCH:
Q. Just to clear up the record, I don't know if I said it, we had marked as Exhibit 1 your affidavit, correct?
A. Yes.
Q. What I just handed you is Exhibit 2. It's a document entitled first amended complaint and reliance upon jury demand for a case in the Wayne County Circuit Court, Case Number 12-009443-CZ. Do you have that in front of you?

Page 59

A. Yes.
Q. Does that refresh your recollection that you did sue Judge James?
A. Yes.
Q. And this would be a copy of the first amended complaint in your lawsuit, correct?
A. Correct.
Q. Is it fair to say that in your complaint you allege you were discharged in violation of Michigan Whistle Blowers Protection Act?
A. Correct.
Q. And you allege that part of the reason for that was that you participated, assisted and/or testified in the investigation and/or inquiries of Judge Sylvia James by the Michigan Judicial Tenure Commission and/or defendants, correct?
A. Correct.
Q. And here you would be referring to your cooperation with the JTC, is that correct?
A. Correct.
Q. And when you say and/or defendants, the other defendants in this case are the City of Inkster and the 22nd District Court, is that correct?
A. Correct.
Q. Did the City of Inkster conduct an investigation into

Page 60

Judge James?
A. Not that I know about. I have no idea.
Q. So you certainly didn't participate in such an investigation if there was one, right?
A. That's correct.
Q. Did the 22nd District Court conduct an investigation into Judge James?
A. The court is an entity, so there's no way the court could have conducted an investigation.
Q. You understand that entities can act through their representatives, correct?
A. Then the court did through Judge Washington.
Q. You assisted Judge Washington in that investigation?
A. I didn't assist Judge Washington per se.
Q. And when you say in Paragraph 13 of your complaint that one of the reasons was testifying in the investigation. You see that portion of Paragraph 13?
A. Yes.
Q. That you would be referring to your testimony at the JTC hearing before the master, correct?
A. That's correct.
Q. Was there any other testimony you provided that you'd be referring to there?
A. No.
Q. Referencing Paragraph 15 of your complaint, you say

that Judge James, I'm quoting this part now, reacted with displeasure to the way Pamela Anderson, Plaintiff, participated in the investigation slash inquiries and started to accuse her and make baseless accusations regarding Plaintiff. Do you see that?
A. Yes.
Q. How did Judge James react with displeasure to the way you participated in the investigation?
A. Well, she wasn't happy that I was helping the JTC.
Q. So I think your testimony was that the first time you learned that the JTC was investigating was when Judge James had told you that, correct?
A. That's correct.
Q. Just before she was placed on administrative leave?
A. Correct.
Q. And then I think you said you did not have any contact with Judge James until it -- well, no contact with Judge James at least until the JTC hearings began, is that correct?
A. That's correct.
Q. So when was it that Judge James reacted with displeasure?
A. I don't recall the specific time, and if I may say, this was something drafted by my attorney.
Q. Well, ultimately this case was dismissed, is that

correct?
A. That's correct.
Q. With respect to your affidavit, Exhibit 1, everything in here is true and correct, is that right?
A. That's correct.
Q. With respect to your testimony at the JTC hearing, was all your testimony true and correct?
A. Yes.
MR. COX: I'm sorry. Just for clarification, you're not talking in front of the master. You're talking in front of the subsequent one, is that correct?
MR. HIRSCH: No. I think the testimony was only in front of the master. I apologize. You're right, Mr. Cox. I apologize.
BY MR. HIRSCH:
Q. The testimony was taken in front of the master where you were sworn in?
A. That's correct.
Q. And that testimony is all true and correct?
A. That's correct.
Q. You weren't at the actual JTC commission hearing on the Judge James' case?
A. No.
Q. And certainly there was no testimony?

A. Correct.
Q. What did you do to prepare for your deposition today?
A. I met with my attorneys.
Q. And I don't want to know what you said with your attorneys, but when did you meet with them?
A. In August and briefly ten minutes today.
Q. Okay. How long was the meeting in August?
A. Maybe two hours.
Q. Other than what we've discussed today during your testimony, did you have any other conversations with anyone about the JTC investigation of Judge James?
A. No.
Q. If you'd give me a moment to go through my notes, I'm probably done or very close to done.
(Off the record at 4:07 p.m.)
(Back on the record at 4:12 p.m.)
BY MR. HIRSCH:
Q. Ma'am, in your affidavit which we marked as Exhibit 1, in Paragraph 9 you talk about Judge Washington asking Nicole James to review the documents in Plaintiff James' office and put any documents that Plaintiff James might want or need into bags. Do you see that portion of Paragraph 9?
A. Yes.
Q. How do you know that?

A. The only thing that I can tell you in this regard is that Judge Washington asked me to help clean out Judge James' office and I said no, I did not feel comfortable doing that, and he said I'll get Nicole to do it because Nicole James was her niece.
Q. Just to be clear here, though, did you hear Judge Washington giving directions to Nicole James?
A. No.
Q. So you're presuming the instructions Judge Washington gave to Nicole James based on what he had asked you to do that you didn't feel comfortable doing, is that correct?
A. That's a fair statement.
Q. And in Paragraph 9 you say that this occurred at some point in 2011, correct?
A. Correct.
Q. Couldn't really pinpoint it there. My question is do you recall if this occurred before or after Nicole James brought you those four boxes?
A. I don't recall.
Q. And other than the day you told me about when you and Judge Washington were in the office and you saw the safe was open or ajar, open a little bit, right?
A. Right.
Q. Had Judge Washington made any comments about the safe

Page 65

prior to that time?
A. No.
Q. Had Judge Washington ever made any comment about wanting to open the safe?
A. No.
Q. I have nothing further. Thank you.
MR. COX: Ma'am, just two or three questions. The same rules apply. If you don't understand what I'm asking, please ask me to clarify or restate, okay?
THE WITNESS: Okay. Sure.
EXAMINATION
BY MR. COX:
Q. The first thing Mr. Hirsch covered with you early on that he had asked you and you told us that Ms. James -- former Judge James hired you, is that correct?
A. That's correct.
Q. And that she was your supervisor, your boss from that point forward, is that correct?
A. That's correct.
Q. Okay. And then you told Mr. Hirsch or testified that after Ms. James was put on administrative leave that Judge Washington then became the interim 22nd District Court judge, correct?

Page 66

A. Correct.
Q. He was placed there by the State Court Administrator's Office, correct?
A. Correct.
Q. And was -- from your position, did you consider him to be your supervisor, your boss, the same as had been the case with Judge James?
A. Yes.
Q. Okay. Now, I think one of the very first questions Mr. Hirsch asked you about on Exhibit 1 was I think Paragraph 15. Do you recall that?
A. Yes.
Q. Okay. Now, in there it talks about the fourth amendment right related to her, that being Plaintiff James, office. Do you recall that?
A. Yes.
Q. Now, I want to ask you more specifically about the safe. Did you know the origin where the safe had come from?
A. No.
Q. Okay. Had you ever seen Judge James bring it into her office from her house or from Costco or Home Depot or anything?
A. No.
Q. And did you know whether the safe was a safe owned by

Page 67

the City of Inkster, the 22nd District Court or by Judge James?
A. I don't know who owned it.
Q. Okay. And at the time when Judge Washington asked -- noted the documents, you didn't know who owned it at that point?
A. That's correct.
Q. Okay. I have nothing further.
MR. POWE: I have nothing.
MR. RATLIFF: No questions.
MR. HIRSCH: I have nothing else. Thank you.
(The deposition was concluded at 4:17 p.m. Signature of the witness was not requested by counsel for the respective parties hereto.)

Page 68

CERTIFICATE OF NOTARY
STATE OF MICHIGAN)
) SS
COUNTY OF WAYNE)

I, HELEN F. BENHART, certify that this Deposition was taken before me on the date hereinbefore set forth; that the foregoing questions and answers were recorded by me stenographically and reduced to computer transcription; that this is a true, full and correct transcript of my stenographic notes so taken; and that I am not related to, nor of counsel to, either party nor interested in the event of this cause.

HELEN F. BENHART, CSR-2614
Notary Public,
Wayne County, Michigan.
My Commission expires: 7/7/2020

A
able 24:18,22 27:12 47:4
accepted 33:11
access 43:15
accurate 49:2
accusations 61:5
accuse 14:3 61:4
act 59:10 60:10
acting 18:20 19:20
action 17:1
actions 49:6,24 50:10,13
actual 26:12 28:5 62:22
Adam 3:1 9:14 9:15 10:20
Adam's 9:16
administrative 12:4 17:23 18:21 19:15 30:4,9 37:17 37:20 43:13,22 61:14 65:23
administrator 20:3 31:24 33:4 57:17 58:3
administrator's 12:11 15:19 16:5 20:6,23 22:9 55:23 66:2
affidavit 52:4,13 52:15 58:18 62:3 63:18
afternoon 5:10
age 13:6,6,7 15:7
agency 12:20
ago 9:9 11:5 13:21 17:15 18:12 43:20
agree 21:9 47:7 52:20
ahead 16:19
air 28:21
ajar 42:1,11 64:23
al 1:10
allege 59:8,12
allegedly 15:2
alleging 46:6
amended 58:22 59:5
amendment 52:17,21 53:1 53:12,15 54:2 66:14
and/or 28:9 59:13,14,16,21
Anderson 1:15 3:17 4:4 5:5,14 5:18 6:17 61:2
Ann 6:17
anonymous 12:16,19
answer 5:22 6:4 6:14 22:4 23:14 53:24
answers 5:20,23 68:9
anybody 20:16 31:1
anymore 47:20
apologize 62:14 62:15
APPEARAN... 2:1
appeared 48:2
Appearing 2:10 2:20 3:8,17
applications 33:10
applied 32:20,22 33:15 54:3
apply 32:18 33:7 53:16 65:8
appoint 32:25
appointed 32:8 32:15 33:18 57:11
approved 15:4
aratliff@wnj.... 3:7
area 9:12 41:22 41:23,24
arrived 23:1 56:18
arts 7:16,17
asked 21:7,15 21:16 22:6 36:15 38:10 64:2,10 65:15 66:10 67:4
asking 5:18 6:5 21:19 27:11 53:4 63:19 65:9
assist 60:14
Assistant 2:13
assisted 59:13 60:13
associate's 7:2
associations 8:25
assumes 53:19
assumption 47:14,18
attached 4:14
attempt 30:1
attempted 29:24
attempting 23:8
attend 6:20 7:20 7:22
attendance 15:10,12,24
attended 7:5,18
attention 41:17
attorney 2:13 53:10 61:24
attorneys 5:11 29:20,23 63:3 63:5
August 63:6,7
authority 16:13
Avenue 2:5
aware 17:8 38:22,25

B
bachelor 7:16 7:17
bachelor's 7:15
back 9:12,14 11:7,11 41:2 41:18,19 42:14 42:19 43:2 50:6 54:4 63:16
bags 49:8 63:22
bar 8:3,6 46:11
bars 8:9
based 53:14 64:10
baseless 61:4
basically 27:9
bathroom 38:17 39:2
began 61:18
behalf 2:10,20 3:8,17 19:21
behaving 13:15 14:3
behavior 13:18
believe 18:8 21:7 31:18 35:11 39:4 50:5 53:15 54:2 55:23
bells 29:17
bench 46:3
Benhart 1:20 68:6,22
Birmingham 2:7
birth 6:18
bit 64:23
Bloom 9:9,24 10:1
Blowers 59:10
Borman 1:8
boss 12:25 65:19 66:6
Bowdich 13:5,7 13:10,21 14:3 15:7 16:8,11 16:17 17:2 32:4,10,15
boxes 48:25 49:3 49:15,17,19,21 50:7,22 51:3 51:16 52:2 64:19
break 6:9,10
Brianna 49:22 49:23
briefly 49:4 63:6
bring 66:21
bringing 49:16 55:18
brought 41:17 47:2 64:19
Building 2:15
Burdon 49:23

C
C-A-N-N-E-R 10:1
calendar 27:20 27:23,25,25 29:4
call 20:8,10 26:2 26:2,3,5 54:23
called 5:6 41:18 41:19
canceled 28:6
Canner 9:9 10:1
Canter 9:24
care 49:25
Cas 29:13

case 1:7 13:5,6,7 15:7 52:4,13 58:23,24 59:22 61:25 62:23 66:7
cases 53:9
categories 24:10 24:13,13,15,16 24:24 25:3 35:7 50:23
category 23:21 27:16 28:12
cause 68:14
Center 3:3
certainly 6:8,12 36:3 52:20 55:2 60:3 62:25
CERTIFICA... 68:1
certify 68:6
chain 35:15
change 53:23
changed 57:25
check 27:2,9,9,9 28:3,4,9,9,24
checks 23:23 24:6,8,21,22 28:2,5,6 29:8 29:11
chief 18:20 37:2 43:10
Chris 9:7,14,21 11:7
Circuit 58:23
City 28:23 34:3 59:22,25 67:1
Civil 2:14 5:15
claim 53:5
clarification 62:10
clarify 6:1 15:14 15:20 65:9
clean 64:2
clean-up 34:9,12 34:15 43:21,25 44:2,5
cleaning 44:12 44:14 45:14
clear 14:11,16 24:3 26:11 58:17 64:6
clearing 48:6
close 43:5 45:25 63:14
closed 22:18 38:1 40:19 54:13
college 6:20,21 7:21,22,25
combination 39:19,20,21 55:5,6
come 16:2 20:12 20:19 24:14,16 27:22 30:12 33:3 41:8 55:8 66:18
comfortable 64:4,11
command 35:15
Commencing 1:18
comment 65:3
comments 64:25
commission 12:17 17:10,14 19:2,7,11,21 29:16 59:15 62:22 68:25
committed 46:7
communication 18:25 19:6,10 19:18 30:3
community 6:21 23:23 24:6,21 24:22 27:2,7 29:9 35:2
compiled 24:24
complaint 12:10 12:13 16:16,21 17:6 58:22 59:6,8 60:15 60:25
complaints 12:16,19 16:18
complete 6:14
computer 68:10
concerned 46:11 46:15,22
concluded 67:13
conduct 36:12 46:16 59:25 60:6
conducted 36:9 60:9
conference 27:21
connection 25:7 25:12 47:4
consider 66:5
contact 25:23,25 29:24 30:1 61:16,17
contacted 25:2
CONTENTS 4:1
continue 11:4 33:4
continued 17:5 33:6 46:5
contrast 54:23
conversation 19:25 26:21 28:13 46:19
conversations 26:24 63:10
convey 16:22
cooperate 23:9
cooperation 59:18
copy 35:18,24
59:5
correct 7:6,7,18 8:1,4,16,20 9:18,19 10:4,8 10:9,16 11:2,3 11:5,6,8,9,23 11:24 12:8,9 13:22,23 14:1 14:2,6,22 15:8 15:9,22,23 16:3,8,11,12 16:14,15 17:10 17:11 18:22 19:17 20:25 21:17,23,24 23:10,19,20 24:20 26:17,19 27:13,14,16,17 28:3,7,8,14,15 29:15 30:1,2 31:9,10 32:5,6 32:16,17 36:5 36:8,20 38:1,2 38:6,10,11,18 39:11,14,20,21 39:24,25 40:22 41:6 42:3,4 43:3,6,18,22 43:25 44:1,8 44:10,11,19,20 44:21 45:5,11 45:12 46:20,21 46:22,23 47:13 47:18,18 48:3 48:7,15,16 49:19 50:17,24 51:1,6,8,9,24 52:4,5,13,18 52:19,21,22,23 52:24 53:1,16 54:6,8,10,15 54:17,18,21,22 54:25 55:4,6,7 55:15 56:16,21 57:2 58:6,9,19 59:6,7,11,16 59:17,19,20,23 59:24 60:5,11 60:20,21 61:12 61:13,15,19,20 62:1,2,4,5,7,12 62:19,20,21 63:1 64:12,15 64:16 65:17,18 65:20,21,25 66:1,3,4 67:7 68:11
cost 28:21,21
Costco 66:22
counsel 67:15 68:13
County 58:23 68:4,24
course 30:13
court 1:1 5:23 6:5 8:12,16 11:16,18,23 12:3,10 13:19 13:24 14:6,9 14:19,20 15:16 15:18 16:4 17:17,17,20 18:20 20:3,6 20:23 22:8,21 23:1 31:23 33:3,16 36:2,7 36:16 37:2,10 37:14,16 39:7 49:7,8,25 50:10,13 55:9 55:23 56:2,8 56:21 57:17,23 58:2,4,24 59:23 60:6,8,8 60:12 65:25 66:2 67:1
courthouse 20:12,20 36:20

courts 8:11
cover 14:13
covered 65:14
covering 14:13 14:15
Cox 3:10,11 4:9 26:11 40:10,24 51:17 53:3,18 62:9,15 65:7 65:13
criminal 52:23
CSP 28:2
CSR-2614 1:20 68:22
custodian 23:25 24:7

D

D 1:8
D-A-D-A-O-U 10:21
Dadaou 9:14,15 10:20,21,22
daily 44:16
data 15:10,12,15 15:25
date 6:18 19:13 41:14 55:12,21 68:7
dates 9:5
David 9:13 10:7
day 17:22,25 18:2 22:23 41:14 48:13 57:16 64:21
days 15:15 27:20 29:4,5
dealing 25:4
Dearborn 6:21 7:5,12
Deborah 19:19 25:4 46:19
decision 31:23 32:13,25
Defendant 3:8 3:17
defendants 1:11 2:20 59:16,21 59:22
defense 53:5
degree 6:24 7:1 7:2,12,14,15
deliver 24:15
demand 58:23
depleted 47:12
deposition 1:15 4:16,17 5:14 52:9 58:14 63:2 67:13 68:7
Depot 66:22
described 18:10 44:21
desk 40:9
Detroit 7:21,22 7:25 8:14
diem 28:22
different 19:4
difficulty 38:7
directed 16:2 50:9
direction 50:2
directions 50:22 51:15 52:2 64:7
directly 35:16
discarded 44:9
discern 27:12
discharged 59:9
discipline 8:23 16:13
disciplined 12:23,24 13:15 15:2,24
discuss 28:16 31:19 45:13,16 46:24
discussed 63:9
discussion 42:24
dismissed 61:25
displeasure 61:2 61:7,22
District 1:1,2 8:18,20 11:16 11:18,23 13:19 13:24 14:6,9 14:20 33:16 36:7,16 55:9 56:8,21 57:22 59:23 60:6 65:24 67:1
Division 1:3 2:14
dockets 50:11 50:14
document 42:13 42:14,16,19 51:13,18,22,23 58:21
documents 21:8 21:16,18 22:7 22:10,12 23:16 23:19,21,24 24:1,10,18,25 25:3 32:1 34:22,25 35:2 35:8,12,14,21 35:22,23 41:21 42:3,6,11,22 47:7,9,23,25 48:2 50:7,9 51:16 63:20,21 67:5
doing 13:6 40:10 48:5 53:6 64:4 64:11
Dokes 14:18,24
door 22:17 36:22,25 37:3 37:22,25 38:10 38:16 39:2 41:25 42:5 48:12 54:6,20 54:24
DOUGLAS 2:12
drafted 61:24
Drazin 9:11 10:3
Drive 1:16 3:12
duly 5:7
duties 23:25 24:4,5,7 33:5

E

earlier 48:18
early 65:14
Eastern 1:2 8:18 8:20
either 27:21 35:18 39:22 47:10 48:6 68:13
Elections 2:14
elector 34:3
electronic 27:25
employed 36:7
employee 57:22
employees 17:17 56:2
employment 2:14 9:2 14:25
ended 9:14
engage 13:18
enter 40:1,6,7
entered 40:8
entering 38:7
entire 6:3 12:3
entities 60:10
entitled 58:22
entity 60:8
essentially 57:25
et 1:10
event 68:13
evidence 53:19
exact 41:14 55:12,21
EXAMINATI... 4:6,8 5:16 65:12
examined 5:9
examiner 29:16
Exhibit 4:13,16 4:17 52:6,9 58:11,14,18,21 62:3 63:18 66:10
Exhibits 4:11,14
existing 57:22
expense 23:24
expenses 21:21 23:19 24:17 28:14,17,19,22 35:3
expires 68:25
expound 16:18
extend 55:24
extent 39:19

F

F 1:20 68:6,22
fact 12:8 22:10 53:19
fair 12:2,5,25 23:8 31:7 45:6 45:8 51:7 52:25 59:8 64:13
familiar 36:19 52:25
far 42:5 50:9
fare 28:21
federal 5:15 8:11,12,16
feel 64:3,11
feet 16:21 17:2
felt 56:2
field 7:3
figure 50:18
file 40:8
filed 58:5
files 44:22 47:10 49:7,8,8,14,25

50:11,14,15
fill 28:20
find 35:7
fine 40:14
finish 6:3
finished 23:3,6
Firm 3:11
first 5:7 8:6 13:9 17:12,16,18 18:14,15,18,25 19:10,18 20:8 20:16 21:1 22:25 25:17,19 25:25 26:21 30:11 31:7 38:25 39:12 45:22 46:9,18 47:1 52:12 58:22 59:5 61:10 65:14 66:9
Fischer 3:8 25:5 25:7
fit 42:12
five 17:15 18:12
Floor 2:15
focusing 20:8
follows 5:9
Ford 6:21,22,24
foregoing 68:8
form 28:19
former 34:6 43:21 49:11 65:16
forth 49:14 68:8
forward 9:3 65:20
found 18:15,18 35:10 50:7
four 48:25 49:17 49:21 52:2 64:19
fourth 52:16,21 53:1,12,15
54:2 66:13
front 58:25 62:10,11,14,17
full 6:16 68:11
fund 27:8
further 65:6 67:8

G

G 2:12,15
garbage 49:9
general 2:13 7:4 7:15,16 9:4,23 10:13,19 11:4 11:11,12
generally 52:25 53:2
getting 44:16,17 46:24
Gibbs 57:21
give 6:4 9:2,4,4 35:14 63:13
given 5:20 49:22 52:1 54:1
giving 64:7
glass 14:8,11
go 9:20 16:19 20:3 27:7,18 37:11 39:3 40:9 43:11 47:22 50:18,22 51:4 54:4 63:13
going 9:20 18:5 18:9 28:4 30:12 35:21 44:4 51:3 53:3 53:18
Good 5:10
gotten 36:6
graduated 9:3
Green 2:21 19:19,20,24 20:5,10,12,17 20:19,22 21:1
21:11,22 22:4 22:6,15,20,25 23:3,9,13 24:14 25:2,4 25:21 46:1,19
guess 53:3
guessing 43:9 57:7

H

Hammer 55:8 55:18 56:7,10 56:11,12,13,17 57:1,4,8
Hammer's 55:13
HAMPTON 1:10
hand 42:12 45:19
handed 58:21
handled 53:9
happened 18:12 23:11 47:15
happy 61:9
hear 30:11 64:6
heard 18:3,6 43:6
hearing 26:9,12 26:16,19 27:1 29:20 30:5 60:20 62:6,22
hearings 61:18
Helen 1:20 68:6 68:22
help 64:2
helping 61:9
Henry 6:21,22 6:24
hereinbefore 68:8
hereto 67:15
HILLIARD 1:10
hired 11:16,18
11:19 39:9,10 57:15,18 65:16
Hirsch 2:3 4:7 5:10,11,17 26:14,15 40:12 40:15,16 41:1 41:7 51:19,20 52:6,11 53:7,8 53:21 58:11,16 62:13,16 63:17 65:14,22 66:10 67:11
history 9:2
home 34:1 66:22
Hon 1:8
honest 42:7
honestly 49:12
honor 22:9
hotel 28:21
hours 63:8
house 66:22

I

idea 20:21 56:24 57:16 60:2
IDENTIFICA... 52:8 58:13
immunity 21:9 21:10,23 22:2 22:4 46:20,24
impression 19:20
improper 29:1 29:10 53:11
in-person 25:20 46:18
inaccurate 15:25 16:4
inappropriately 13:15 14:4
incorrect 13:3
index 51:10
indicate 31:22
indicated 10:14 21:15 29:7
51:2
indicating 17:2
information 27:11
Initially 51:2
initiated 26:3
injury 10:2,6
Inkster 9:12 28:23 33:20,25 34:3 59:22,25 67:1
input 31:1
inquiries 59:14 61:4
inside 50:1
instructed 48:9 49:23
instructions 48:4 64:9
interested 68:13
interim 30:7,11 30:17,21,24 31:2,5,8,12 65:24
interrupt 6:12
intimate 13:18
investigated 17:9,13 18:16
investigating 21:12 61:11
investigation 17:18 18:5,7 19:7 21:6 23:12 25:8,13 25:18 26:13,25 46:5,13,25 47:5 59:14,25 60:4,6,9,13,17 61:3,8 63:11
invite 33:7,9
involved 34:15
involvement 23:12 32:13
issue 21:20

28:23 53:11
issues 57:8
items 37:12

J

J.D 7:25
James 1:5 11:21 11:22,25 12:6 12:8,11,14,17 12:20,22,23 13:9,9,13 15:11,16 16:3 16:17,22 17:8 17:12,17,19,19 17:22 18:8,18 18:19 19:2,8 19:12,14 21:6 21:12 23:12 25:8,13,18 27:1,4,21 28:18,20,24 29:6 30:3,8,13 30:17 34:18,22 35:3 37:2,6,6,9 37:10,14,15,17 37:20 38:3 39:2,4,6,9 43:10,13,24 44:15,19 45:10 45:13 46:2,5,6 46:25 47:5,12 48:4,10,23 49:13,16 54:16 54:19 58:8,10 59:3,15 60:1,7 61:1,7,12,17 61:18,21 63:11 63:20,22 64:5 64:7,10,19 65:16,16,23 66:7,15,21 67:2
James' 14:25 15:3 27:4 29:19,23 34:6 34:9,12 36:10 36:13,17,19,22 37:11,13 38:5 38:8,12,17,22 40:1,25 43:15 43:21 47:8,23 48:6 49:11 53:16,20,23 62:23 63:21 64:3
Jason 2:3 5:11
Jeffrey 13:5,6 13:21
jeopardy 46:12
jhirsch@mor... 2:9
job 13:3 23:25
JTC 2:20 15:21 17:19 21:11 26:9 27:1 29:20 30:5 46:5,6 59:19 60:20 61:9,11 61:18 62:6,22 63:11
Judd 3:2
judge 1:9 11:21 11:22,22,25 12:6,8,11,14 12:16,20,22,23 13:8,9,13 14:25 15:3,10 15:16 16:3,17 16:22 17:8,12 17:17,19,19,22 18:8,8,18,19 18:20 19:2,8 19:12,13,23 21:6,12 23:12 25:8,13,18 26:25 27:3,4 27:21 28:18,20 28:24 29:6,19 29:23 30:3,7,8 30:11,13,17,17 30:20,21,23,24 31:2,4,5,7,8,11 31:12,14,19,22 32:1,7 33:2,7 33:12 34:6,6,9 34:10,12,13,18 34:19,21,22,25 35:3,11,16,18 36:9,10,12,13 36:15,17,19,22 37:2,2,6,11,13 37:14,15,17,20 38:2,4,5,7,12 38:13,15,17,22 39:2,3,6,9 40:1 40:4,6,17,24 40:25 41:17,19 42:2,8,15,24 43:5,10,10,13 43:15,21,24 44:3,15,18 45:2,10,16 46:2,5,6,25 47:5,8,12,21 47:23 48:6,9 48:12,19 49:11 49:13 53:16,20 53:23 54:16,19 54:23 55:8,13 55:14,17,18,24 56:3,4,7,10,11 56:12,13,14,17 57:1,4,8 58:8 58:10 59:3,14 60:1,7,12,13 60:14 61:1,7 61:11,17,18,21 62:23 63:11,19 64:2,2,6,9,22 64:25 65:3,16 65:24,25 66:7 66:21 67:2,4
judicial 12:17 17:9,13 19:1,7 19:11,21 29:16 37:16 59:15
jury 31:18 58:23

K

keep 35:18 47:4 51:8
Kevin 14:18
key 37:7,9,13,18 38:12 39:14,16 48:15,17,20 55:3
keys 36:24 37:3 37:5
knew 20:1,2 44:14 53:20 54:10
know 6:10,13 17:1 18:13 19:23,24 20:19 21:8,20 22:20 22:25 23:2,3 23:14 24:23 25:5,10 26:18 28:18 29:21 30:14,20,23 31:4 32:20,22 32:25 33:9 34:19 35:12 36:9,11,15,18 36:24 37:3,9 37:18,19,22,24 37:25 38:2,9 39:6,8,13,17 39:18 40:15,21 44:5,12,18 45:9,23 47:15 47:19,21,21,24 48:9,19 49:12 49:15 50:4,9 50:14 51:10,12 52:16 53:19 54:5,8,12,12 54:16 55:1,5 56:4,7,10,25 57:11,14,14,16 57:17,20 58:17 60:2 63:4,25 66:18,25 67:3 67:5
knowledge 53:14 54:1
known 37:10

L

L.L.P 3:2
laid 56:22,23,25 57:5,12 58:5
Lansing 2:17
Laurel 1:16 3:12
law 3:11 7:18,20 7:21,23,25 8:15 9:3,7,21 9:21,24 10:5 10:12,17 47:4 52:23
lawsuit 58:5 59:6
learn 33:10 46:6
learned 17:12 17:16,18 18:5 46:9 61:11
leave 12:4 17:23 18:21 19:15 30:4,9,18 37:17,20,22 39:2 40:2 43:13,22 46:2 54:20 61:14 65:23
left 23:4 36:2,4 37:21 38:2,3 43:2 47:12
legal 53:4
let's 30:5 52:6
letter 13:12 14:24 15:3
letters 13:11
license 8:15

46:11 47:4
liked 12:8 56:3 56:13,14
litigate 53:10
Litigation 2:14
little 64:23
living 33:18,25
Livonia 1:17 3:14 5:1
locate 24:18,22
located 49:25
lock 36:22,24,25 39:16 48:12 54:5 55:6
locked 37:22 38:16 39:23 54:8,10,12,16 55:2
log 51:8,10
long 9:9 18:23 22:14 57:4 63:7
longer 36:6 55:14
look 41:21 42:2 45:25 47:23
looked 42:10,18 44:18 51:21
looking 23:16,22
lookout 34:23 35:1,5
lost 54:3
lot 29:7 44:25

M

M 6:21 7:5,12
ma'am 5:10 6:18 63:18 65:7
Maggie 15:20 35:12
magistrate 1:9 13:4,10,24 32:5,11,15 33:1,8,11,16 33:19 56:17 57:12,15
mail 49:24 50:13
mails 49:6
majority 24:23
making 47:14
marathon 6:8
March 57:2,5
Margaret 25:10
mark 52:6 58:11
marked 52:8 58:13,18 63:18
master 26:16 27:1 60:20 62:11,14,17
material 48:22 49:10
matter 5:12
mc@mikecoxl... 3:16
mean 8:14 12:24 18:4 21:3,25 22:1 33:9 40:12 44:3,14 47:9,21
meet 31:11 63:5
meeting 17:20 17:25 18:10 20:2,16,22 21:2 22:14,18 22:23,25 23:4 23:6,13 25:21 31:14,17,20 32:2 63:7
meetings 20:4
member 8:3,6,9 8:25 36:16
memory 28:8
Mennen 2:15
mentioned 10:7 10:20 13:21 15:6 23:18 25:3 27:16 46:18
met 20:2,14 22:20 26:8 31:7 63:3
MICHAEL 3:10
Michigan 1:2,17 2:7,17 3:5,14 5:1 8:3,7,14,17 8:20 12:17 13:8 17:9,13 19:1,6 59:9,15 68:2,24
Mike 3:11
minutes 43:20 63:6
miscellaneous 49:9
misconduct 46:7
Mm-hum 40:11
moment 11:5 13:21 63:13
month 20:4
Morganroth 2:4 2:4
mother's 33:25
moved 9:12,14 11:7,10 34:10 34:13 44:6

N

name 5:11 6:16 49:22
nature 21:11 27:6
need 6:9 63:22
never 13:13,14 38:10,16 43:17
new 57:15,17
newspapers 49:8
Nicole 34:18 37:6,9,10 43:24 45:13 48:4,9,23 49:15,16 63:20 64:4,5,7,10,18
niece 64:5
night 48:12
Norcross 3:2
North 1:16 2:5 3:12
Notary 68:1,23
noted 67:5
notes 63:13 68:12
notice 5:14 40:18
noticed 41:16 45:2
number 25:16 58:24
Numerous 25:16

O

oath 5:20
object 53:3,18
observe 44:13 54:13
obtain 7:12
occurred 52:1 64:14,18
October 1:19 5:2
office 9:11,13,16 9:16 10:14,18 10:25 12:11 13:16,19 14:4 14:6,8 15:19 16:5,20 20:6 20:23,23,24 22:9,17 23:4 34:6,7,9,12 36:10,13,17,19 36:22,24 37:3 37:11,13,18,22 38:5,8,12,14 38:17,23 39:1 40:1,17 41:15 41:18,20,22,24 43:2,21 44:13 44:18 45:6,10 45:14 47:8,11 47:17,20,23 48:6,12,15,20 48:23 49:1,11 49:13,17 52:17 53:16,23 54:5 54:20 55:24 63:21 64:3,22 66:3,15,22
officer 14:19
offices 9:7,21
oh 27:2 42:13
okay 5:23 6:1,2 6:6,7,10,14,15 9:2,6 11:13 13:2 16:16 18:18 19:5 20:12 24:6,24 25:5 29:19 40:10 46:1 63:7 65:10,11 65:22 66:9,13 66:21 67:4,8
old 2:5 49:6,6,8 49:14,24 50:10 50:13
once 20:4
ones 8:13
open 22:17 38:1 38:10 39:3 40:18 41:10,16 41:25 42:5 43:17 54:20,24 64:23,23 65:4
open-door 48:14
opened 41:9,11
opinion 56:12
opinions 53:4
opposed 26:12
orally 16:22 33:13,14
organization 12:14

origin 66:18
Ottawa 2:16
outside 49:13
overlap 55:15
owned 39:6,7 66:25 67:3,5

P

P.L.L.C 2:4 3:11
p.m 1:18 5:3 41:5 52:10 58:15 63:15,16 67:13
pack 44:15,23
packed 48:23 49:14
PAGE 4:3,13
pages 45:23
Pamela 1:15 4:4 5:5,14 6:17 61:2
paper 27:25 28:1,10 43:8 44:21 45:21
papers 44:16,22 49:14
paperwork 44:4
paragraph 52:12,15 60:15 60:17,25 63:19 63:23 64:14 66:11
Park 1:16 3:12
part 23:25 24:3 24:5,7 53:5 59:12 61:1
participate 50:25 60:3
participated 59:13 61:3,8
parties 67:15
partnership 10:22,24
party 68:13
Paul 1:8 25:5
people 32:22 37:13 52:20 58:8
period 7:8,22 18:15,19,23
periodically 37:12
periods 6:22 9:18
Perry 10:7,12
Perry's 9:13
person 20:14 25:24 26:1,8
personal 10:2,6
personally 35:20
phone 25:23,25 26:3,5
photocopies 28:6
photocopy 28:8
physically 38:1 41:25
pinpoint 64:17
place 18:1 20:22 22:23 31:17 33:25 40:8 57:4
placed 17:22 18:21 30:4,8 30:18 37:17,20 37:21 39:13 40:2 43:13,22 46:2 61:14 66:2
plaintiff 1:6 2:10 5:12 52:16 61:3,5 63:20,21 66:14
pleas 49:6,24 50:13
please 5:22 6:1,3 6:10,16 19:3 52:7 53:25 58:12 65:9
point 11:15 13:4 32:4 37:1 54:10 55:8 64:15 65:20 67:6
pointed 42:9
Polaczyk 9:7,15 9:21 11:8
policy 48:14
portion 13:25 41:4 60:17 63:23
position 32:5,18 32:20,23 33:8 33:11,15 56:20 58:2 66:5
positions 57:25
possible 47:25
possibly 21:9
POWE 2:12 67:9
powed1@mic... 2:19
practice 9:22,23 9:25 10:5,12 10:13,17,19 11:1,4,10,11 11:12
practiced 52:23 56:11
practitioner 10:10
prepare 14:24 15:10,15 63:2
prepared 15:7
preparing 15:2 15:24
present 40:6
presume 35:4
presuming 64:9
previously 33:15
Pricilla 57:21
prior 19:24 27:1 29:20 57:5 65:1
privacy 52:21
private 38:17
probably 63:14
problem 29:5 46:2
Procedure 5:15
process 51:1
professional 8:22,25
program 29:9
progressed 45:3
Protection 59:10
provide 23:16 48:4
provided 52:4 52:13 60:22
provisions 53:1
Public 68:23
pulled 42:12,15
Purdy 49:22 50:2,4,6,14,18 51:15 52:2
pursuant 5:14
put 12:3 14:13 42:14,19 47:22 63:21 65:23

Q

question 5:25 6:3,5 19:4 41:1 41:2 53:24 54:3 64:17
questioned 26:18 29:21
questions 5:19 53:4 65:8 66:9 67:10 68:8
quite 36:6
quoting 61:1

R

R 1:9 2:3
rat 44:15,23
RATLIFF 3:1 67:10
reached 42:12 45:19
react 61:7
reacted 61:1,21
reaction 18:3
read 41:2,5
really 44:3 51:5 56:3 64:17
reask 41:1 53:22
reason 59:12
reasons 60:16
recall 11:13 16:6 16:7,10,25 17:5,7,12,15 17:16,24,25 18:23 21:3,13 21:18 22:14,17 22:23 23:7,14 23:16,21 24:11 25:1,2,4,16,17 25:19,20,25 26:1,4,21,24 28:4 29:23 30:7,13,15 31:21 32:10 35:15,20,24 36:1 38:7,15 41:14,15 42:7 42:20 43:4 46:1,4,9 48:18 48:19,22,25 51:13,25 52:3 53:10 55:21 57:4 58:10 61:23 64:18,20 66:11,15
recalled 28:12
receive 6:24 7:1
received 7:25

35:12,13
recognize 53:5
recollection 29:15,25 59:2
record 5:13,23 6:6,14,16 41:4 53:6 58:17 63:15,16
recorded 68:9
records 27:12
reduced 68:10
Referencing 60:25
referring 59:18 60:19,23
refresh 59:2
regard 64:1
regarding 14:24 21:20 34:22 61:5
register 8:16 28:3,4
registers 49:6,24 50:10,13
reimbursed 28:18
reimbursement 27:5 28:13,25
reimburseme... 28:17 29:2
related 52:17 66:14 68:12
relating 35:2
reliance 58:22
remain 31:23 55:17
remember 9:17 18:13 49:18 55:12
removed 18:9 18:14,17 19:14 30:14 32:4,10 32:16 44:6 47:8,11,14,25

49:11
removing 45:14
reorganized 48:1
replace 30:8 33:3 57:11
replaced 30:17
report 13:6,6,7 15:7 16:3,8 50:6
reporter 5:23 6:5 37:11,14 37:16 41:5 58:4
representative 19:1,11
representatives 60:11
reprimand 13:11,12
request 22:9 23:9 28:9,22 55:17,22 56:1
requested 24:14 27:5,10 41:4 67:14
requests 27:3
residence 33:21 33:23
respect 9:20,24 17:1 23:24 24:6,17 27:7 27:15 28:2,25 29:4,8 42:21 46:25 53:22 62:3,6
respective 67:15
response 16:24
responsible 13:5
restate 19:3 53:25 65:10
restroom 6:9 38:20 41:23
result 46:12

58:5
retrieve 37:12
return 45:23,24
returns 42:13 43:6
review 13:9 49:3 49:19 63:20
reviewed 29:8
right 10:3 12:25 14:11 24:11,11 24:19 26:14 28:10 35:5,25 36:1 38:5 39:10 41:3 44:7 45:4 47:8 47:10,16,20 50:19,23 51:23 52:17,20 55:5 60:4 62:4,15 64:23,24 66:14
ring 29:17
role 55:13
room 31:18
rule 46:16
rules 5:15 65:8
Rynier 15:21 25:10,12,17,23 26:2,8,22,25 27:11,19,23 28:13,16 29:9 35:12,13,14,17 35:19

S

safe 38:22,25 39:4,6,12,14 39:17,23 40:18 41:8,10,16,21 41:23,25 42:3 42:6,10,11,14 43:8,11,15,17 45:19 51:14,21 52:17 53:16,20 53:22 54:8 55:1 64:23,25

65:4 66:18,18 66:25,25
Saturday 16:2,7
saw 41:8 42:10 43:17 64:22
saying 22:2 28:20 54:14
Schlussel 9:10 10:3
school 7:18,20 9:3
se 60:14
search 34:21,24 36:10,12,17 53:11
second 27:15
secretary 37:16
see 14:16 39:4 42:5,5 44:6 45:24 51:3 60:17 61:5 63:22
seen 51:13 66:21
selected 30:20 30:23
sent 28:23
series 5:18
serve 30:20,23 31:2,8,12
served 31:5
service 23:23 24:6,21,22 27:2,8 29:9 35:2
set 68:8
sets 33:4
shared 27:23
sheet 45:20
short 9:13
show 5:13
showed 28:19 35:11
shred 49:24 50:16 51:15

shredded 50:10 50:11 51:5,8 51:11
signature 14:25 15:3 67:14
signed 13:13,14
single 45:20 51:22
sink 39:5
sir 5:21 8:5
sit 16:20 40:9
sitting 17:2 44:4 49:13
situation 10:23 15:6
six 17:15 18:12
slash 61:3
sliding 14:8
slightly 19:4
smaller 44:17,17 45:3
solo 10:10 31:14
sorry 8:21 9:15 10:24 19:23 26:14 37:16 40:24 51:17 54:4 62:9
sort 9:24 10:5 10:12,17 34:25 51:15,25 54:23
sorted 50:21
sorting 50:25
sorts 21:18
sounds 49:2
SOUTHERN 1:3
Southfield 3:5 9:10,11
speak 19:18 25:7,12 29:13 29:19 34:23 39:3
specific 9:5 19:13 21:13

25:16 41:14 61:23
specifically 20:1 22:13 66:17
specifics 18:13
spoke 20:17 25:17 46:1
SS 68:3
stack 45:21
stacks 44:16,21 45:3 47:10,12 50:21
staff 17:20 36:16
standing 41:22
stapled 45:22 51:22
started 9:7 51:2 61:4
State 8:3,6,14 12:10 13:8 15:18 16:4 20:3,6 22:8 55:23 66:2 68:2
stated 18:12
statement 12:5 45:8 46:22 51:7 64:13
states 1:1 8:9
stay 51:17 56:4 56:17
stayed 35:4
stenographic 68:11
stenographica... 68:9
Steven 1:9
stored 50:12
street 2:16 9:16
strike 19:23 20:9 26:6 34:20 52:12 54:3 57:14
studies 7:4,15 7:16
stuff 44:25 45:6 45:9 48:25
subject 8:22
submitted 13:7 15:18,20 16:4 16:9
submitting 15:6
subsequent 62:11
subsequently 22:12
substance 21:5 26:21,24
sue 59:2
sued 58:8
suggest 29:5,10 47:3
suggested 29:1
Suite 1:16 2:6 3:4,13
summary 15:15
supervisor 11:25 12:2,22 16:11 65:19 66:6
supposed 43:14 48:5 50:16
sure 5:22 6:4 21:13 22:8 29:15 41:2 47:3 51:5 65:11
surprised 18:4
suspect 52:16
Swastek 29:13
sworn 5:7,19 62:18
Sylvia 1:5 59:14

T

T 3:1
table 4:1 49:13
take 6:10 11:15 20:22 31:17 37:25 45:21 49:25
taken 1:16 5:14 29:6 36:3 62:17 68:7,12
takes 11:13
talk 63:19
talked 43:20
talking 6:6 26:12 62:10,11
talks 66:13
tax 42:13 43:6 45:23,24
telephone 20:10
tell 9:8 13:2 16:20 20:1 21:5,11 38:4 43:8,11,14 44:9,15 49:16 64:1
telling 18:8
ten 63:6
tenure 12:17 17:9,13 19:1,7 19:11,21 29:16 40:18,25 59:15
terminated 56:20
terms 23:11 24:10 27:18 48:5
testified 5:9 21:23 48:18 54:11,19 55:2 59:13 65:22
testify 5:7 21:9
testifying 60:16
testimony 60:19 60:22 61:10 62:6,7,13,17 62:20,25 63:10
Thank 65:6 67:11
thing 18:6 23:11 23:15,18 45:16 64:1 65:14
things 21:21 27:3,5 48:1 49:9 56:15
think 6:8 9:11 9:17 10:14 11:7 26:3,18 27:15 28:12 48:18 53:23 54:11,19 61:10 61:16 62:13 66:9,10
thought 16:3 18:14 51:23
three 65:7
Thursday 1:19 5:2
tidying 48:6
time 5:25 6:9,12 6:22 7:8,22 9:3 9:13,18 11:10 11:15,23,25 12:3,22 13:4,5 13:25 14:22 17:8,18,25 18:15,23 20:16 21:7 22:10,23 25:17,19 27:4 27:15,18 30:4 31:4,7 33:18 33:21 34:4 35:25 37:1,21 38:12 40:22 41:8,24 42:22 42:25 43:10 45:3 47:1 48:17 49:23 54:2 55:25 56:10 57:5 61:10,23 65:1 67:4
timeline 51:25
times 25:15 40:7 40:8
today 35:22 63:2 63:6,9
told 9:17 11:4 13:10 16:24 17:17 18:18 21:6,8 30:14 30:15 43:24 61:12 64:21 65:15,22
Town 3:3
transcript 4:14 68:11
transcription 68:10
travel 21:20 23:19,24 24:17 27:5 28:14,17 28:19,25 35:2 35:3
true 62:4,7,20 68:11
truth 5:7,8,8
try 6:1,12
two 6:6 7:9 24:10 37:12 63:8 65:7
type 9:21 14:13 49:9

U

U 6:21 7:5,12
ultimately 35:12 35:13 56:20 61:25
undergraduate 6:20
underlying 26:16
understand 5:19 5:25 6:4 20:5 21:25 22:1 49:10 53:24 60:10 65:9
Understood

53:7
UNITED 1:1
unlocked 37:23 54:12
upset 13:9
use 34:6 38:5,20
usual 8:15
Usually 48:14

V

Valdemar 30:19
verbally 5:22
violated 46:15
violation 59:9
vs 1:7

W

walked 42:10
walking 44:13
want 40:12 63:4 63:22 66:17
wanted 28:18 56:4,6
wanting 65:4
Warner 3:2
warrants 46:3
Washington 2:20 30:19,20 30:23 31:4,7 31:11,15,19,22 32:1,7 33:2,7 33:12 34:6,10 34:13,18,19,21 34:25 35:11,16 35:19 36:9,12 36:15 38:4,13 38:16 40:4,6 41:17,19 42:2 42:8,15,25 43:5,24 44:3 45:2,17 47:22 48:9,12,19 55:14,17 56:3 56:4,14 60:12 60:13,14 63:19 64:2,7,9,22,25 65:3,24 67:4
Washington's 40:17,25 54:23 55:24
wasn't 10:24,24 24:3 50:16 61:9
way 28:2 39:9 40:21 48:1 56:2 60:8 61:2 61:7
Wayne 33:24 58:23 68:4,24
we'll 6:10,13
we're 26:11,11
we've 63:9
went 23:3 27:2,3 27:4,9 35:15 43:2 45:10 47:19 48:23,25 51:21
weren't 47:16 47:16,19,25 62:22
West 2:16
Whalen 1:9
Whistle 59:9
Williams 2:15
window 14:8,11 14:14,16
witness 4:3 5:6 40:11,14 41:6 44:2 65:11 67:14
Woodward 2:5
word 47:9
words 21:13 38:13
work 27:22
worked 9:9,10 9:12 10:7,25 13:19 20:5
working 10:22 22:8 56:15
wouldn't 36:3 55:24
write 13:10
written 27:10
wrong 21:10 22:3

X

Y

Yeah 40:12 51:19
year 11:13
years 7:9 9:8 17:15 18:12
Yep 8:21

Z

0

1

1 4:16 52:6,9 58:18 62:3 63:18 66:10
12 1:19 5:2
12-009443-CZ 58:24
12/28/1960 6:19
120E 1:16 3:13
13 60:15,17
15 52:15 60:25 66:11
16th 57:2,5
17430 1:16 3:12
1983 7:10
1984 7:24
1987 7:24 8:8
1990s 49:7

2

2 4:17 58:11,14 58:21
2:12-cv-10273 1:7
2:39 1:18 5:3
200 2:6
2000 3:3
2007 11:17
2011 12:4 64:15
2012 57:2,6
2017 1:19 5:2
22nd 11:16,18 11:22 13:19,24 14:6,9,20 33:16 36:7,16 55:9 56:7,21 57:22 59:23 60:6 65:24 67:1
248.784.5154 3:6
248.864.4000 2:8
2700 3:4

3

3:31 41:5
3:50 52:10
3:58 58:15
344 2:5

4

4:07 63:15
4:12 63:16
4:17 67:13
48009 2:7
48075 3:5
48152 3:14
48933 2:17

5

5 4:7
517.373.6434 2:18
52 4:16
525 2:16
58 4:17
5th 2:15

6

65 4:9

7

7/7/2020 68:25
734.591.4002 3:15
79 6:23

8

81 6:23
84 7:13

9

9 63:19,23 64:14